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#### **REMARKS**

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application are respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims are respectfully requested.

#### **Status of Claims**

Claims 1-20 are pending in the application.

Claims 1, 5-7, 10, 11, and 14-18 have been amended. Applicants respectfully assert that the amendments to the claims add no new matter.

New claims 19-20 have been added in order to further define what the Applicants consider to be the invention. Applicants respectfully assert that no new matter has been added.

#### **The Telephone Interview**

Initially, Applicants wish to thank the Examiner, Kevin K. Xu, and the Supervisory Primary Examiner, Mark Zimmerman, for granting and attending the telephone interview, with Inventor, Moshe Ben-Chorin, and Applicants' Representatives.

In the Interview, Applicants' representatives asserted that claims 1 and 10 would be allowable over the cited references. Specifically, Applicant's representatives asserted that the

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Edge reference does not describe, teach or fairly suggest generating light of at least three colors which are selected to define a viewed color gamut which substantially covers a perceived color gamut of a set of inks when printed on a substrate. More particularly, Applicant's representatives asserted that Edge merely describes adjusting a data transformation applied to image data displayed by a conventional display, which produces light of red green and blue conventional spectra defining a conventional RGB gamut. Accordingly, Applicants representatives asserted that the display described by Edge does not produce light of at least three colors selected to define the viewed gamut which substantially covers the perceived color gamut. The Supervisory Primary Examiner stated that a further review of the cited references may be required before determining whether the pending claims would be allowable over the cited references.

#### **Voluntary Amendments**

Claims 1, 5-7, 10, 11, and 14-18 have been voluntarily amended to more clearly define the subject matter claimed by the present Application. These amendments do not add new matter to the Application and are not being made for reasons of patentability.

#### **CLAIM REJECTIONS**

##### **35 U.S.C. § 103 Rejections**

In the Office Action, the Examiner rejected claims 1, 4, 6-9, 10-11, 15-16 and 18 under 35 U.S.C. § 103(a), as being unpatentable over Karakawa (US 6,304,237) in view of Edge (US 2002/0167528). Specifically, the Examiner contended that Karakawa teaches a

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light source to generate light of a set of at least three primary colors, and a controller to produce a light pattern corresponding to an image by selectively controlling the path of the light. The Examiner stated that Karakawa fails to teach the at least three colors are selected to define a viewed color gamut which substantially covers the perceived color gamut of the set of inks when printed on the substrate. However, the Examiner contended that Edge teaches this feature.

Applicants respectfully traverse the rejection of claims 1, 4, 6-9, 10-11, 15-16 and 18 under 35 U.S.C. § 103(a), because a prima facie case of obviousness has not been established, as discussed below.

As is well established, in order to establish a prima facie case of obviousness, the prior art references must teach or suggest all the claim limitations. As discussed in detail below, Applicants respectfully submit that both Karakawa and Edge, alone or in combination, do not disclose, teach or fairly suggest one or more of the features recited by claims 1 and 10.

Independent claims 1 and 10 recite, in paraphrase, generating light of at least three colors having at least three different chromaticities, respectively, the chromaticities selected to define a viewed color gamut which substantially covers a perceived color gamut of the set of inks when printed on the substrate; and controlling the path of the light to produce a light pattern corresponding to the proofed image (emphasis added). As discussed in detail below, Applicants respectfully submit that Karakawa and Edge, alone or in combination, do not disclose, teach or fairly suggest at least this feature of claims 1 and 10.

Applicants respectfully assert that Edge merely describes a conventional display device, which generates light of conventional red, green and blue (RGB) spectra. The light generated by the display device described by Edge has a conventional RGB gamut, which is

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not related in any way to the perceived gamut of inks printed on a substrate. Edge also describes transforming color coordinates between hard copy and soft copy proofing environments to enable matching of images displayed by the conventional display and printed images (page 2, paragraph 23). As discussed below, Applicants respectfully assert that the transformation described by Edge relates to a transformation applied to the image data, and does not relate in any way to the gamut of the light generated by the light source of the display device.

In the portions of Edge cited by the Examiner, Edge merely describes generating corrected color coordinates for the conventional display device, by determining a white point correction matrix, and a chromatic correction matrix (page 1, paragraphs 9-10, and 12). Applicants respectfully assert that the white point correction described by Edge relates to adjusting a phosphor setting of the display device. As is well known in the art of color displays, adjusting a phosphor setting of a color display does not relate to the chromaticity and/or gamut of the light produced by the light source of the display device. Applicants further assert that the chromatic correction described by Edge refers to adjusting RGB chromaticities of an Adobe working space by applying a mathematical transformation (Page 4, paragraph 49). The adjusted chromaticities are applied to the image data to be displayed, and the conventional RGB light produced by the display device is modulated in accordance with the adjusted image data. Accordingly, Applicants assert that the chromatic correction of Edge relates to the transformation applied to the image data, and does not relate in any way to the chromaticity of the RGB light generated by the light source of the display device.

Therefore, Applicants submit that both Karakawa and Edge fail to teach or fairly suggest all elements of independent claims 1 and 10, at least because these references do not

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teach generating light of at least three colors having chromaticities selected to define a viewed color gamut which substantially covers a perceived color gamut of the set of inks when printed on the substrate.

In view of the above, it is respectfully submitted that independent claims 1 and 10 are patentable over Karakawa and Edge. Accordingly, it is respectfully requested that the rejection of claims 1 and 20 under 35 U.S.C. §103(a) be withdrawn.

Furthermore, it is respectfully submitted that independent claims 1 and 10 are patentable, and thus allowable, over any combination of the prior art references on record. In this regard, it is noted that the distinguishing features of independent claims 1 and 10, as discussed above, would not have been obvious at the time the invention was made to a person skilled in the art, in view of Karakawa and Edge, alone or in combination with any other cited references, including the Lind reference discussed below in connection with claims 2, 3, and 12-13; and/or the Baba reference discussed below in connection with claims 5, 14 and 17.

Claims 4, 6-9, and 18 depend directly from independent claim 1 and incorporate all the elements of this claim. Claims 11 and 15-16 depend directly from independent claim 10 and incorporate all the elements of this claim. Therefore, it is respectfully submitted that claims 4, 6-9, 11, 15-16, and 18 are patentable, and thus allowable, at least for the reasons set forth above.

In the Office Action, the Examiner rejected claims 2-3 and 12-13 under 35 U.S.C. § 103(a), as being unpatentable over Karakawa in view of Edge and further in view of Lind (US 6,069,601).

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Claims 2 and 3 depend directly from independent claim 1 and incorporate all the elements of this claim. Claims 12 and 13 depend directly from independent claim 10 and incorporate all the elements of this claim. Therefore, it is respectfully submitted that claims 2, 3, 12 and 13 are patentable, and thus allowable, at least for the reasons set forth above.

In the Office Action, the Examiner rejected claims 5, 14 and 17 under 35 U.S.C. § 103(a), as being unpatentable over Karakawa in view of Edge and further in view of Baba (US 2002/0122019).

Claims 5 and 17 depend, directly or indirectly, from independent claim 1 and incorporate all the elements of this claim. Claim 14 depends directly from independent claim 10 and incorporates all the elements of this claim. Therefore, it is respectfully submitted that claims 5, 14, and 17 are patentable, and thus allowable, at least for the reasons set forth above.

#### Remarks to New Claims

New claims 19 and 20 recite, in paraphrase, generating the light of the at least three colors independently of the proofed image. Applicants respectfully assert that no new matter has been added.

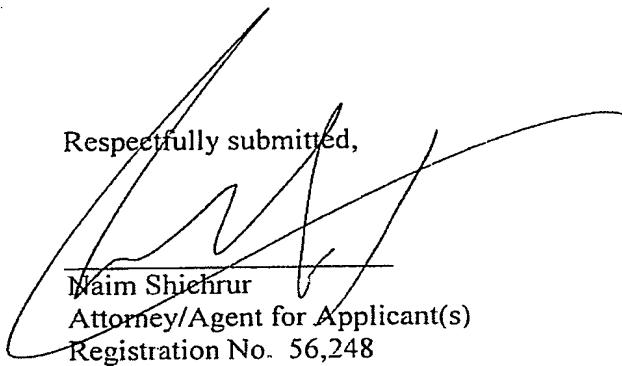
New claim 19 depends directly from independent claim 1 and incorporates all the elements of this claim. New claim 20 depends directly from independent claim 10 and incorporates all the elements of this claim. Therefore, it is respectfully submitted that new claims 19 and 20 are patentable, and thus allowable, at least for the reasons set forth above.

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

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Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

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